

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

KAJEET, INC.,

Plaintiff,

v.

INFOWEISE PTY., LTD.,

Defendant.

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CIVIL ACTION NO. 6:21-cv-704-ADA

JURY TRIAL DEMANDED

PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiff KAJEET, INC. ("Plaintiff") moves for entry of a default against Defendant INFOWEISE PTY., LTD. ("Defendant") and would respectfully show the court as follows:

1. Plaintiff filed a Complaint for patent infringement against Defendant on July 7, 2021 (Dkt. 1).
2. Defendant was duly served with process via the Texas Secretary of State on July 8, 2021. The return of service is on file with the Court (Dkt. 8).
3. On July 14, 2021, the Texas Secretary of State forwarded the service package to Defendant at its home office address in Australia.
4. More than twenty-one (21) days have elapsed since the Defendant was served. To date, Defendant has failed to answer, plead, or otherwise defend the allegations in Plaintiff's Complaint.
5. Pursuant to Federal Rule of Civil Procedure 55(a), a default must be entered against a party, against whom a judgment of affirmative relief is sought, when that party has failed to plead or otherwise defend the action.

6. Because Defendant has failed to plead or otherwise defend this action, Plaintiff respectfully requests that the Clerk of Court enter a default against Defendant.

7. In support of this request, Plaintiff relies upon the record in this case and the declaration of Corby R. Vowell attached as Exhibit A.

Dated: August 19, 2021.

Respectfully submitted,

/s/ Corby R. Vowell

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ATTORNEYS FOR KAJEET, INC.

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August, 2021, I electronically filed the foregoing document with the clerk of the court for the United States District Court, Western District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Corby R. Vowell